

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

IN RE:	§	CASE NO. 20-41227
	§	
ROYAL TRANSPORT EXPRESS, LLC	§	Chap. 11
	§	
Debtor,	§	
	§	

AGREED MOTION TO APPROVE AGREED ORDER
CONDITIONING AUTOMATIC STAY

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES Transportation Alliance Bank, Inc. d/b/a (“TAB Bank”) and Debtor Royal Transport Express, Inc. (misnamed in its Petition for Relief as Royal Transport Express, LLC) (the “Debtor”), hereby submits this Agreed Motion To Approve Agreed Order Conditioning Automatic Stay (the “Motion”) and hereby states, as follows:

1. TAB Bank and Debtor requests that the Court enter the Agreed Order submitted herewith.
2. Good cause exists for granting of the requested relief.

NOTICE TO PARTIES IN INTEREST:

ANY OBJECTION OR REQUEST FOR HEARING MUST BE FILED WITH:

Clerk, United States Bankruptcy Court
Eastern District of Texas
Sherman Division
660 N. Central Expressway
Plano, TX 75074

NO HEARING WILL BE CONDUCTED ON THIS MOTION UNLESS A WRITTEN OBJECTION IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AND SERVED UPON THE PARTY FILING THIS PLEADING WITHIN FOURTEEN (14) DAYS FROM THE DATE OF SERVICE UNLESS THE COURT SHORTENS OR EXTENDS THE TIME FOR FILING SUCH OBJECTION. IF NO OBJECTION IS TIMELY SERVED AND FILED, THIS PLEADING SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER

GRANTING THE RELIEF SOUGHT. IF AN OBJECTION IS FILED AND SERVED IN A TIMELY MANNER, THE COURT WILL THEREAFTER SET A HEARING. IF YOU FAIL TO APPEAR AT THE HEARING, YOUR OBJECTION MAY BE STRICKEN. THE COURT RESERVES THE RIGHT TO SET A HEARING ON ANY MATTER.

WHEREFORE, PREMISES CONSIDERED, TAB Bank and Debtor respectfully requests that the Court enter the Agreed Order submitted herewith and grant such other relief to which it may be entitled.

Date: July 16, 2020

Respectfully submitted,

BY: /s/ Aaron B. Gottlieb

Aaron B. Gottlieb

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By: /s/ Eric A. Liepins

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Attorney For Debtor

CERTIFICATE OF SERVICE

I do hereby certify that on the 16th day of July, 2020, a true and correct copy of the foregoing document was served, via ECF and regular U.S. mail, on the parties on the attached mailing matrix.

/s/ Aaron B. Gottlieb

Aaron B. Gottlieb

Label Matrix for local noticing
0540-4

Case 20-41227

Eastern District of Texas

Sherman

Thu Jul 16 10:45:43 CDT 2020

ACAR Leasing LTD d/b/a GM Financial Leasing
c/o Wilcox Law, PLLC
P.O. Box 201849
Arlington, TX 76006-1849

ACAR Leasing
P.O. Box 9000
Lutherville Timonium, MD 21094-9000

ACAR Leasing LTD d/b/a GM Financial Leasing
P.O. Box 183853
Arlington, TX 76096-3853

AT&T
PO Box 630047
Dallas, TX 75263-0047

BMO Harris Bank
111 W Monroe
Chicago, IL 60603-4095

BMO Harris Bank N.A.
3925 Fountain Blvd NE, Ste. 105
Cedar Rapids, IA 52411-6620

Bank OZK
17901 Chenal Parkway
Little Rock, AR 72223-4786

Blue Ridge Financial
535 Washington Street
Suite 201
Buffalo, NY 14203-1430

COLLIN COUNTY TAX ASSESSOR/COLLECTOR
Abernathy, Roeder, Boyd & Hullett, P.C.
1700 Redbud Blvd., Suite 300
McKinney, TX 75069-3276

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BANKRUPTCY MAIL INTAKE TEAM
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MONROE LA 71203-4774

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Linebarger Goggan Blair & Sampson, LLP
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Collin County Tax Assessor Collection
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Department of Justice
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10th & Constitution Ave., NW
Washington, DC 20530-0001

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The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Chase Bank
P.O. Box 94014
Palantine, IL 60094-4014

(d)Chase Bank
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Palatine, IL 60094

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)ACAR Leasing LTD d/b/a GM Financial Leasin

(d)AT&T
PO Box 630047
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(d)BMO Harris Bank
111 W Monroe
Chicago, IL 60603-4095

(u)Bahadur Dhesi

(d)Bank OZK
17901 Chenal Parkway
Little Rock, AR 72223-4786

(d)City of Wylie
Linebarger Goggan Blair & Sampson, LLP
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Document Page 6 of 6

(u)Harpreet Singh

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(d)WEX Bank
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Suite 350
Midvale, UT 84047-6023

End of Label Matrix
Mailable recipients 42
Bypassed recipients 15
Total 57